

# GUARANTY SAVINGS AND HOMESTEAD ASSOCIATION

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September 21, 2000

Manager, Dissemination Branch  
Information Management and Services Division  
Office of Thrift Supervision  
1700 G Street, NW.  
Washington, D.C. 20552

2000 SEP 25 PM 4:51

OFFICE OF THRIFT SUPERVISION  
DISSEMINATION BRANCH

RE: Comments on Proposed Changes  
to Thrift Financial Report

Ladies and Gentlemen:

We offer the following comments regarding the proposed changes to the Thrift Financial Report as published in the Federal Register on August 4, 2000:

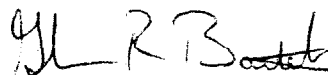
**Item 14 Board of Directors' IRR Limits** - We object to the disclosure of an association's interest rate risk limits established by its Board of Directors on Schedule SI. An institution utilizing its own models and methodologies might be subjected to undue criticism when its limits are compared to and vary from the "normal" range of shock scenarios as set forth in the OTS model.

**Item 19 Holding Company Financial Information**  
**Item 20 Transactions with Affiliates**

Business transactions between a subsidiary thrift and its holding company are currently reported on Form HB11 on a quarterly basis. The addition of these reporting requirements to the TFR is repetitive and unnecessary. The disclosure of this information in one report should be sufficient.

Thank you for your time and consideration, I remain

Sincerely,



Glenn R. Bartels  
Controller



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